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Via Email

January 6, 2024

John R. Jacobson
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Mintz & Gold LLP
600 Third Avenue, 25th Fl.
New York, New York 10016

RE: *Hunt v. Southern Baptist Convention et al.*, 3:23-cv-243 (M.D. Tenn.)

Dear Counsel:

We write on behalf of Plaintiff Johnny Hunt with respect to Defendant Guidepost Solutions LLC's ("Guidepost") document productions.

Our review of the recent document production by the [REDACTED] in response to our subpoenas raises serious concerns regarding whether Guidepost has complied with its most basic discovery obligations in this case. Our concerns are particularly acute given the produced text exchange between [REDACTED] and Lead Investigator Russell Holske where [REDACTED] asked if the documents provided to Guidepost were "[REDACTED]" [REDACTED] 000040 (emphasis added). Specifically, the [REDACTED] production included numerous emails and other documents exchanged between the [REDACTED] and Guidepost that were not produced by Guidepost and were responsive to Plaintiff's Requests for Production.

These discovery defaults include, but are not limited to:

1. May 8, 2022 letter to Roy Blankenship ([REDACTED] 0000692).
2. July 19, 2022 email thread between [REDACTED], Julie Myers Wood, and Russell Holske ([REDACTED] 0000596).
3. February 11 and 13, 2022 emails between [REDACTED] and Russell Holske ([REDACTED] 0000639-41).

4. April 21, 2022 emails between [REDACTED] to Russell Holske ([REDACTED] 0000152-53).
5. April 17, 2022 email from [REDACTED] to Russell Holske and Samantha Kilpatrick ([REDACTED] 0000154).
6. April 1, 2022 emails between [REDACTED] Mack and Russell Holske ([REDACTED] 0000132-33).
7. May 4, 2022 emails from [REDACTED] to Russell Holske, and Samantha Kilpatrick ([REDACTED] 0000180-81).¹

These documents are directly responsive to Plaintiff's Requests for Production including, Request Nos. 22, 23, 24, 27, 33.²

Please provide an explanation in writing why the above documents were not produced and supplement your production by the close of business on January 8, 2024. At a minimum, the supplemental production must include copies of all the documents in your possession, custody, or control that are responsive to Plaintiff's Requests for Production. Additionally,

- If you do not have the specific missing documents described above, please state that and explain in detail why there are no such documents.
- If there are additional responsive documents that are no longer in your possession, custody, or control, please explain why in detail.
- Identify all documents that were destroyed relating to the investigation of Plaintiff.

Finally, please provide a privilege log that identifies all documents Guidepost is withholding on the basis of privilege by close of business on January 8, 2024.

Best regards.

Very truly yours,



Robert D. MacGill

cc: All counsel of record

¹ Plaintiff did not attempt to identify a complete list of documents produced by the [REDACTED] that should have been included in Guidepost's document production.

² RFP No. 22 "All documents relating to any communications with the Complainant," RFP No. 23 "All communications with the Complainant's husband," RFP No. 24 "All documents relating to any communications with the Complainant's husband," RFP No. 27 "All communications with Roy Blankenship," RFP No. 33 "All documents relating to Guidepost's investigation of Complainant's allegations against Johnny Hunt."